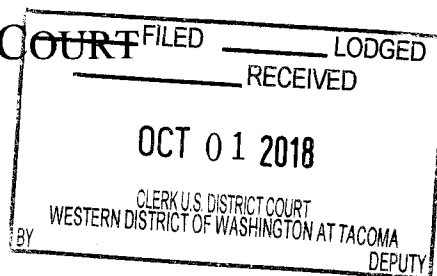


UNITED STATES DISTRICT COURT

for the
Western District of Washington



In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

7818 NE 91st Ave., Vancouver, WA 98662 (SUBJECT
PREMISES); gold 2006 Hyundai Sonata bearing Oregon
license plate 445GLA (SUBJECT VEHICLE)

Case No.

MJ18-5221

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

The Subject Premises as further described in Attachment A-1, and the Subject Vehicle as further described in Attachment A-2, which are attached hereto and incorporated herein by this reference.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, which is attached hereto and incorporated herein by this reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
Title 18 U.S.C. § 641	Theft of Public Funds
Title 18 U.S.C. § 1028A(a)(1)	Aggravated Identity Theft
Title 18 U.S.C. § 1029(a)(2)	Access Device Fraud
Title 18 U.S.C. § 1542	False Statement in Application and Use of Passport
Title 42 U.S.C. § 408(a)(7)(B)	Social Security Number Misuse

The application is based on these facts:

See attached Affidavit.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Special Agent Christopher S. Jones, SSA-OIG

Printed name and title

Sworn to before me and signed in my presence.

Date:

10/1/18

City and state: TACOMA, WASHINGTON

J. RICHARD CREATURA, U.S. Magistrate Judge

Printed name and title

2018R00888

ATTACHMENT A-1

LOCATION TO BE SEARCHED – “SUBJECT PREMISES”

7818 NE 91st Ave, Vancouver, WA 98662 is a two-story, four-bedroom single family home located within Clark County, WA. The residence is located on the west side of NE 91st Ave inside a suburban neighborhood with multiple other single family homes located nearby. The residence is more particularly described as olive green in color with white and orange trim. There is a front entry door with a porch and steps leading up to the entrance from the driveway. The home has a two-car garage that faces NE 91st Ave, with the numbers “7818” prominently displayed vertically in dark-colored numbers on the left trim of the garage door.



ATTACHMENT A-2

LOCATION TO BE SEARCHED – “SUBJECT VEHICLE”

A gold 2006 Hyundai Sonata with Oregon license plate “445GLA” and Vehicle Identification Number 5NPEU46F66H129157.

ATTACHMENT B

ITEMS TO BE SEIZED

The following records, documents, files or materials, in whatever form that constitute evidence, instrumentalities, or fruits of violations of Theft of Public Funds in violation of 18 U.S.C. § 641; False Statement in Application and Use of Passport in violation of 18 U.S.C. § 1542; Social Security Number Misuse in violation of 42 U.S.C. § 408(a)(7)(B); Access Device Fraud in violation of 18 U.S.C. § 1029(a)(2) and; Aggravated Identity Theft in violation of 18 U.S.C. § 1028A(a)(1).

1. Identification documents in the name “Tod Mitchell Thomas” or “Edward Thomas Lewis” to include, but not limited to: driver’s licenses, ID cards, Social Security cards, birth certificates, and US and/or foreign passports.
2. Correspondence and documents from federal/state agencies and private businesses addressed to “Tod Mitchell Thomas” or “Edward Thomas Lewis”.
3. Any documents pertaining to employment and/or self-employment performed by “Steven Lynn Ross”, “Tod Mitchell Thomas”, or “Edward Thomas Lewis”, to include, but not limited to: W-2s, 1099s, pay stubs, resumes, certificates/awards, offer/termination letters, business licenses, ledgers, and billing records.
4. Social Security Administration documents, records, and information related to: Steven Lynn Ross and his application/receipt of disability benefits and any estimated SSA benefit statements pertaining to “Tod Mitchell Thomas” or “Edward Thomas Lewis”.
5. Evidence of any medical procedures that reflect significant medical care occurred (e.g. heart transplant) for Steven Lynn Ross and any associated medical/hospital or Medicare billing.
6. Credit cards, debit cards, checkbooks, and any other monetary instruments belonging to “Tod Mitchell Thomas” or “Edward Thomas Lewis”.
7. Financial records such as bank account statements, investment account statements, receipts, wire transfers, deposits, checks, withdrawals, applications related to “Steven Lynn Ross”, “Tod Mitchell Thomas”, or “Edward Thomas Lewis”.

8. Records of property ownership, such as vehicle or property deeds, in the names "Steven Lynn Ross", "Tod Mitchell Thomas", or "Edward Thomas Lewis".
9. Any information pertaining to MagicJack phone number (503) 895-5282 or device number A921050801D1B0.
10. Internal Revenue Service documents, tax records, tax filings, and tax information pertaining to "Steven Lynn Ross", "Tod Mitchell Thomas", and "Edward Thomas Lewis".
11. Any identification documents or other records belonging to other aliases or identities not known to law enforcement at this time, but that based under the totality of the circumstances, are believed to be used by the subject known as "Steven Lynn Ross".
12. Items of dominion and control of the residence located at 7818 NE 91st Ave, Vancouver, WA 98662.
13. Any records of store units, safe deposit boxes, or any other location where evidence may be secured.

AFFIDAVIT

STATE OF WASHINGTON)
)
 COUNTY OF PIERCE)

ss

I, CHRISTOPHER S. JONES, been duly sworn, hereby state as follows:

INTRODUCTION

1. I am a Special Agent with the Social Security Administration, Office of the Inspector General ("SSA-OIG"), assigned to the Seattle, Washington Field Office, and have been so since 2014. I am a graduate of the Criminal Investigator Training Program and Inspector General Investigator Training Program at the Federal Law Enforcement Training Center and have received regular training in the enforcement of law of the United States, including the preparation, presentation, and service of criminal complaints, arrest, and search warrants. As a SSA-OIG Special Agent, my duties include investigating fraud, waste, and abuse related to the Social Security Administration ("SSA") and its programs. During my tenure as a Special Agent, I have conducted numerous investigations of criminal activity including identity theft, government benefit fraud, disability fraud, bank fraud, wire fraud, and other fraud or financial crimes.

2. The information contained in this Affidavit is based on my own personal knowledge and observations, as well as information conveyed to me by other law enforcement officers; on my review of documents and records related to this investigation; and information gained through my training and experience. Because this Affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, it does not set forth every fact that I or others have learned during the course of this investigation.

PURPOSE OF AFFIDAVIT

3. Based on the evidence set forth in this Affidavit, I submit that probable cause exists to search the premises specified below for evidence, fruits, and instrumentalities of the following crimes: Theft of Public Funds in violation of 18 U.S.C. § 641; False Statement in

1 Application and Use of Passport in violation of 18 U.S.C. § 1542; Social Security Number
2 Misuse in violation of 42 U.S.C. § 408(a)(7)(B); Access Device Fraud in violation of 18
3 U.S.C. § 1029(a)(2) and; Aggravated Identity Theft in violation of 18 U.S.C. § 1028A(a)(1).

4 4. This Affidavit is being submitted in support of applications for warrants
5 authorizing the search of:

6 (1) the residence of STEVEN LYNN ROSS ("ROSS") located at 7818 91st
7 Ave NE Vancouver, WA 98662 ("SUBJECT PREMISES"). ROSS is the
8 current property owner and has owned the home since 2009. ROSS is
9 believed to live alone at the SUBJECT PREMISES. This address is
10 currently reported by ROSS to the SSA, Medicare, and on bank accounts
11 held at KeyBank and Bank of America. ROSS has also recently been
12 observed at this address by law enforcement.

13 (2) the vehicle of ROSS, a gold 2006 Hyundai Sonata with Oregon license
14 plate "445GLA" and Vehicle Identification Number
15 5NPEU46F66H129157 ("SUBJECT VEHICLE"). The vehicle is
16 registered to ROSS and has been observed being driven by ROSS and
17 parked at the SUBJECT PREMISES.

18 5. A further detailed description of the SUBJECT PREMISES is listed in
19 Attachment A-1 of this Affidavit. The SUBJECT VEHICLE is described in Attachment A-2
20 of this Affidavit. The items to be searched for and seized are listed in Attachment B of this
21 Affidavit.

22 6. This warrant request does not include the search of computers or digital media.

23 **SUMMARY OF THE INVESTIGATION**

24 7. The SSA-OIG initiated a criminal investigation on July 5, 2018, based on
25 information it learned from the Washington State Department of Licensing, License Integrity
26 Unit ("DOL/LIU") that ROSS was suspected of having applied for, and received, WA
27 driver's licenses in at least two other identities: Tod Mitchell Thomas ("T.M.T.") and
28 Edward Thomas Lewis ("E.T.L.").

8. The subsequent investigation by the SSA-OIG and United States Department of State, Diplomatic Security Service ("DSS") determined that the true T.M.T. and E.T.L. died as children in the 1950s/1960s and that, beginning in approximately 1987, ROSS stole and assumed their identities to fraudulently obtain and use Social Security Numbers ("SSN"), US passports, multiple state driver's licenses, and open multiple bank/credit accounts in the identities of T.M.T. and E.T.L.

9. Beginning in 1998, ROSS began working under the identity of T.M.T. In 2001, ROSS applied for, and began receiving, SSA Title II Disability Insurance Benefits ("disability benefits") in his true identity while continuing to work under the T.M.T. identity until 2013. As a result of ROSS's actions, the SSA was defrauded out of roughly \$366,000.

10. Furthermore, for at least a period of one-year, between July 2017 and June 2018, ROSS conducted approximately 11 ATM withdrawal transactions within the Western District of Washington, exceeding a total of \$1,000, using an associated debit card to access a bank account opened in the T.M.T. identity.

11. To date, ROSS is still actively maintaining and using the victim identities to apply for state identification cards and to open/use multiple bank and credit accounts.

STATEMENT OF FACTS SUPPORTING PROBABLE CAUSE

12. ROSS is a United States ("US") citizen born on September 21, 1951 in Logansport, Indiana and is a current resident of Vancouver, Washington ("WA"). ROSS is presently retired from employment and receives SSA Retirement Insurance Benefits ("retirement benefits"). ROSS is a veteran and served in the US Air Force from 1972 to 1974.

A. Washington State Department of Licensing Investigation

13. DOL/LIU first investigated ROSS in December 2009 after the Clark County, WA Sheriff's Office ("CCSO") reportedly arrested ROSS on December 18, 2009, at a KeyBank branch in Vancouver, WA after he presented a legitimate WA Driver License in the identity of E.T.L. with an altered expiration date.

1 14. According to police reports, when ROSS was questioned by CCSO deputies,
2 he initially maintained he was E.T.L. and provided a Chase Bank debit card and altered
3 Department of Veterans Affairs card in the E.T.L. name. Ultimately, ROSS admitted his true
4 identity was actually "STEVEN LYNN ROSS" and explained to the deputies he ordered a
5 birth certificate online in order to obtain the WA driver's license in the E.T.L. identity.

6 15. ROSS told CCSO deputies he made up a SSN and used it to open the KeyBank
7 account in the E.T.L. name adding, *"I don't trust the government and I wanted to protect my*
8 *money. I setup a bank account under [E.T.L.] so the money would be safe."* ROSS was
9 subsequently arrested on charges of forgery and false statement to a public official. For
10 unknown reasons, the case was never prosecuted in Clark County courts and there is no
11 arrest record in the Washington Crime Information Center ("WACIC") or National Crime
12 Information Center ("NCIC") for this incident.

13 16. The 2009 DOL/LIU investigation determined that ROSS made false statements
14 in an application for a driver's license under the E.T.L. identity. ROSS was unresponsive to
15 WA Department of Licensing ("WA DOL") hearing and interview requests related to the
16 investigation and his driver license was suspended in March 2010 for a period of one year.
17 No criminal charges were filed by WA DOL or state/local law enforcement agencies related
18 to ROSS's fraudulent application and use of the E.T.L. driver's license and the E.T.L. card
19 was cancelled by WA DOL.

20 17. On June 24, 2013, ROSS was arrested by the Cincinnati, Ohio Police
21 Department for misdemeanor theft and provided the officers with a WA driver's license in
22 the name of T.M.T. whereupon he was subsequently booked into jail as T.M.T. I have
23 reviewed the booking photo of this arrest and confirmed ROSS was the individual arrested
24 and charged as T.M.T. in this incident. ROSS was released on bail the following day and the
25 case was resolved in July 2013 as "continued without finding."

26 18. On July 2, 2013, ROSS applied for a replacement WA driver's license in the
27 T.M.T. identity and stood for a photo during the application process. The photo for T.M.T.
28 was immediately flagged by WA DOL's facial recognition systems due to the face matching

1 ROSS's WA driver's license and the replacement card was not issued. Due to a DOL/LIU
2 investigative backlog, the facial recognition flag was not investigated until 2018, when SSA-
3 OIG was first contacted by DOL/LIU investigators about ROSS.

4 19. I have reviewed WA DOL's records for ROSS, T.M.T., and E.T.L. driver
5 licenses, which show ROSS has applied for, and received, WA driver's licenses under all
6 three identities and in which he is pictured.

7 20. Beginning in 1987, ROSS was issued a WA driver's license in the identity
8 E.T.L. after presenting an Oregon instruction permit and birth certificate as proof of identity.
9 Replacement driver licenses were then issued by WA DOL for the E.T.L. identity in 1991,
10 1995, 1999, and 2003.

11 21. Beginning in 1995, ROSS was issued a WA driver's license in the T.M.T.
12 identity after presenting a Social Security card and Oregon driver's license as proof of
13 identity. Replacement driver licenses were then issued by WA DOL for the T.M.T. identity
14 in 1999, 2003, and 2008.

15 22. On the 2008 WA driver's license for the T.M.T. identity, an address of 8002
16 NE Hwy 99 #191, Vancouver, WA 98665 (the "MAILBOX") was provided, which is
17 actually a rental mailbox at a company, 'The Letter Box', located at the physical address. On
18 the 2013 WA driver's license for the T.M.T. identity, ROSS provided an address of 7818 NE
19 91st Ave, Vancouver, WA 98662 ("SUBJECT PREMISES"), which is believed to be
20 ROSS's current residence and is a home currently owned by ROSS under his true identity.
21 The SUBJECT PREMISES address is also the same address ROSS provided on a 2011 WA
22 driver's license application in his true identity.

23 **B. Death Records for T.M.T. and E.T.L.**

24 23. I conducted public internet search queries and located possible grave markers
25 indicating that the true T.M.T. and E.T.L. died as children in Oregon several decades ago.

26 24. Death certificates were then obtained from the Oregon ("OR") Health
27 Authority that confirmed the true T.M.T. and true E.T.L. are deceased: E.T.L. died in 1958 at
28 less than two (2) years old as a result of a car accident that occurred in Woodburn, OR.

1 T.M.T. died in 1968 on Green Peter Mountain, OR at the age of 13 years as a result of a
 2 plane crash. A news article was reviewed which indicated his parents and siblings were also
 3 killed in the crash.

4 **C. SSN Applications for ROSS, T.M.T., and E.T.L.**

5 25. I have reviewed SSA records for the identities of ROSS, T.M.T., and E.T.L.
 6 and noted all three identities have an established SSN. The SSNs for T.M.T. and E.T.L. were
 7 both established in 1987, decades after the death of the true individuals.

8 26. A search of the SSA Death Master File found no record that T.M.T. and E.T.L.
 9 have ever been reported to the SSA as deceased. Based on my training and experience, there
 10 are generally no death entries for individuals who died several decades ago as children,
 11 before they were assigned SSNs. In present day, children are typically assigned SSNs at birth
 12 and their deaths are reported to the SSA.

13 27. In April 1968, SSN X-3695 was applied for, established, and assigned to
 14 ROSS referencing his true date of birth ("DOB") of XX/XX/1951, place of birth ("POB") as
 15 Logansport, Indiana, and parents E.P. and W.R.

16 28. In April 1987, a SSN application was submitted for T.M.T. referencing his true
 17 DOB of XX/XX/1955, true POB of Tacoma, Washington, and true parents R.M. and J.T.
 18 The SSN application shows the SSN was processed from the Portland, OR SSA office and a
 19 birth certificate and unknown state driver's license was used for proof of identity. The
 20 application was accepted and SSN X-9888 was established and assigned to T.M.T.

21 29. In May 1987, a SSN application was submitted for E.T.L. referencing his true
 22 DOB of XX/XX/1957, true POB of Los Angeles, California, and true parents A.S. and E.L.
 23 The SSN application shows the SSN was processed from the Vancouver, WA SSA office
 24 and a birth certificate and WA driver's license was used for proof of identity. The application
 25 was accepted and SSN X-9576 was established and assigned to E.T.L.

26 **D. US Passport Applications and International Travel for ROSS, T.M.T., and E.T.L.**

27 30. In December 1982, ROSS was issued a US passport in his true identity with
 28 replacement US passports issued in 1986, 1996, 2006, and 2016. On the October 2016

1 passport application, ROSS listed his address as the SUBJECT PREMISES. This passport is
2 still valid through November 2026.

3 31. In April 1987, a US passport was issued for the T.M.T. identity. Replacement
4 US passports were issued in 1997 and 2007 referencing addresses in Vancouver, WA. On the
5 2007 passport application, the listed address was the MAILBOX. The passport for this
6 identity expired in July 2017.

7 32. In June 1987, a US passport was issued for the E.T.L. identity. Replacement
8 US passports were issued in 1997 and 2008 referencing addresses in Vancouver, WA and
9 Seattle, WA. On the 2008 passport application, the emergency contact address lists the
10 MAILBOX address (omitting box #191) in the emergency contact. The passport for this
11 identity expired in February 2018.

12 33. I have reviewed the US passport photos for E.T.L, and T.M.T. which all
13 clearly show ROSS is the individual pictured.

14 34. I have reviewed travel records provided by the Department of State, which
15 shows ROSS traveled under the T.M.T. passport to transit between the US and multiple
16 foreign countries. Since 1998, ROSS traveled to and from the US approximately 22 times
17 using the T.M.T. passport, with the last trip occurring in January 2011. During this same
18 time period, ROSS also regularly conducted foreign travel using his true identity and
19 associated passport.

20 **E. Reported Work Activity for ROSS and T.M.T.**

21 35. The SSA receives reports of earnings for the US working population each year
22 from employers who generally provide to the SSA the worker's name, SSN, wages earned,
23 and taxes paid. Earnings are only applied to a worker's record if the name and SSN match
24 the SSA's record for the SSN number holder. This earnings data is then used to administer
25 the Social Security programs and is stored by the agency.

26 36. I have reviewed the SSA earnings data, which show historical earnings activity
27 occurred under the ROSS and T.M.T. identities. There are no reported historical earnings for
28 the E.T.L. identity. SSA earnings records for ROSS show he engaged in consistent and

1 substantial work activity from 1968 through 1998, utilizing his true identity of ROSS and
2 SSN X-3695, for employers in the technology manufacturing field. After 1998, there are no
3 more reported earnings for ROSS.

4 37. Beginning in 1998, earnings are first reported under the T.M.T. name and SSN
5 X-9888. From 1998 through 2013, there are substantial earnings under T.M.T. for employers
6 in the technology manufacturing field, including Astronics Corporation and Volt Information
7 Sciences, as well as self-employment earnings. After 2013, there are no more reported
8 earnings for the T.M.T. identity.

9 38. I have reviewed employment records from Astronics Corporation and Volt
10 Information Sciences concerning the T.M.T. identity. The employment records from both
11 companies show employment for T.M.T. began in 2007 at Astronics Corporation and 2011 at
12 Volt Information Sciences.

13 39. I have conducted a visual comparison of the T.M.T. signatures on the 2007 and
14 2011 employment applications and found they readily appear to match the signature on the
15 T.M.T. WA driver's licenses in which ROSS is pictured.

16 40. A review of Astronics Corporation records shows T.M.T.'s 2007 emergency
17 contact information lists a J.W.R. of Reno, Nevada and describes him as his "brother-in-
18 law." Based on the emergency contact address and phone number provided, this individual
19 has been identified as ROSS's biological brother, J.W.R., who resides near Reno, Nevada.

20 41. On a 2007 Astronics Corporation's employee application sheet, completed in
21 what appears to be ROSS's handwriting, for the position of Senior Principal Engineer, there
22 is a section that questions if the employee, T.M.T., is disabled and it is checked "No".

23 **F. Overview of the Social Security Disability Program**

24 42. SSA disability benefits are provided to persons deemed disabled by the SSA
25 who have paid sufficient Federal Insurance Contribution Act ("FICA") taxes to become
26 eligible for monthly payments upon a finding that they meet all eligibility factors for
27 entitlement.
28

1 43. An individual can receive SSA disability benefits if he/she is found to be
2 disabled within the meaning of Social Security Law and has insured status, i.e., has paid in
3 sufficient FICA taxes. An individual meets the definition of disability if he/she is so disabled
4 that he/she cannot perform their previous work or any other type of work in the national
5 economy. This disability or combination of disabilities, must be expected to last for at least
6 12 continuous months or result in death.

7 44. The ability of SSA to properly make initial determinations as to both an
8 applicant's medical and financial eligibility for the SSA disability program is directly
9 dependent upon SSA's access to accurate and current information regarding that applicant.
10 Moreover, if an applicant initially is found to be eligible, and therefore becomes a recipient
11 of disability benefits, SSA's ability properly to determine that recipient's continuing
12 eligibility, and the correct monthly benefit due that recipient, likewise is directly dependent
13 upon SSA's ongoing access to accurate and current information regarding that recipient.

14 45. If an individual returns to work, or their medical condition improves, they are
15 routinely reminded by the SSA of their responsibility to report this information in a timely
16 manner to the agency so that their monthly benefit amount and/or continuing eligibility can
17 be evaluated.

18 **G. Fraudulent Application and Receipt of Social Security Disability Benefits**

19 46. In May 2001, ROSS applied for disability benefits with the SSA and claimed
20 that he last worked in 1998. However, SSA earnings records for T.M.T. show significant
21 work and earnings activity for the years 1998, 1999, 2000, and 2001 in which he earned
22 between \$63,000 and \$111,000 annually.

23 47. In October 2001, ROSS was approved for disability benefits by the SSA with
24 diagnoses of cardiovascular and musculoskeletal disorders and received these monthly
25 disability benefits from approximately November 2001 to September 2017. ROSS received
26 his last SSA disability check on September 27, 2017.

27 48. During the years of 2001 through 2013, ROSS received these monthly
28 disability benefit payments, while continuing to engage in work activity and earning

1 substantial income as T.M.T. during this same time period, which would have made him
2 ineligible and terminated for such disability benefits, had the SSA known about the work and
3 earnings. Though his reported work activity ended in 2013, ROSS was ineligible for the
4 disability benefits he received between 2013 and September 2017 because he did not
5 establish disability after terminating work activity in 2013.

6 49. In September 2017, the SSA automatically converted ROSS's disability
7 benefits into retirement benefits due to ROSS reaching full retirement age. SSA records
8 show ROSS is currently receiving these monthly retirement benefits into a KeyBank account
9 ending in 2284 and presently reports to SSA his address as the SUBJECT PREMISES.

10 **H. Theft of Public Funds**

11 50. Based on my investigation, ROSS fraudulently applied for, and received, SSA
12 disability benefits under his true identity, while at the same time working and earning
13 substantial income under the identity of T.M.T., thereby making him ineligible for disability
14 benefits under SSA's program rules.

15 51. On September 4, 2018, the SSA Seattle Regional Office's Center for Disability
16 and Program Services (SSA/CDPS) reviewed this investigation's findings regarding ROSS's
17 2001 application and receipt of disability benefits while working under the T.M.T. identity
18 from 1998 through 2013. SSA/CDPS determined that, had SSA known about ROSS's
19 substantial work activity and earnings (as T.M.T.) at the time of his application in 2001, the
20 SSA would have been determined ROSS to be initially ineligible for disability benefits.

21 52. Furthermore, SSA/CDPS found that the substantial wages ROSS earned from
22 2001 through 2013 under the T.M.T. identity would have made him ineligible for continuing
23 disability benefits, had the work and/or earnings been truthfully reported to SSA at the time.

24 53. Furthermore, SSA/CDPS found that the substantial wages ROSS earned from
25 2001 through 2013 under the T.M.T. identity would have made him ineligible for continuing
26 disability benefits, including through 2017, had the work and/or earnings been truthfully
27 reported to SSA at the time.

54. As a result, SSA/CDPS has determined ROSS was ineligible for disability benefits for the months of October 2001 through August 2017 (which were paid the month following each month benefits owed), including the following specific payments, each made by direct deposit into bank accounts in the ROSS identity:

DATE	AMOUNT
May 24, 2017	\$2,076.00
June 28, 2017	\$2,076.00
July 26, 2017	\$2,076.00
August 23, 2017	\$2,076.00
September 23, 2017	\$2,076.00

The total loss to SSA due to this ineligibility is \$366,038.30.

I. SSN Misuse, Access Device Fraud, and Aggravated Identity Theft

55. Records obtained from financial institutions and credit agencies show ROSS has opened approximately 20 credit accounts with multiple financial institutions since 1997 using the personally identifiable information of T.M.T. and E.T.L. Of these accounts, approximately 11 are still open in the T.M.T. and E.T.L. identities with regular purchases and balance payments occurring as recent as July 2018.

56. I have reviewed records from JPMorgan Chase Bank ("Chase"), which shows ROSS opened a checking account ending in 3473 ("SUBJECT ACCOUNT") in the T.M.T. identity on December 20, 2001 with Washington Mutual Bank (later purchased by Chase). On the account application, ROSS provided the name, SSN, DOB, and mother maiden name of T.M.T. along with presenting a WA driver's license in the T.M.T identity. At the time of the Chase account opening in 2001, an address of 905 SE 136th Ave, Apt #U6, Vancouver, WA was provided, which was the same address listed on ROSS's Washington State driver's license in 2001.

57. The SUBJECT ACCOUNT is still an active, open account in the identity of T.M.T. with the MAILBOX being used as the currently reported address.

58. According to Chase records, within a one-year period, between July 1, 2017 and June 30, 2018, an access device—to wit, a debit card ending in 9454—was used approximately 11 times to access SUBJECT ACCOUNT at a Chase ATM in Vancouver, WA and conduct cash withdrawal transactions totaling over \$1,000:

Transaction Date	Type	City, State	Amount
July 01, 2017	ATM Withdrawal	Vancouver, WA	\$200
July 20, 2017	ATM Withdrawal	Vancouver, WA	\$200
August 4, 2017	ATM Withdrawal	Vancouver, WA	\$100
September 23, 2017	ATM Withdrawal	Vancouver, WA	\$120
October 21, 2017	ATM Withdrawal	Vancouver, WA	\$400
December 30, 2017	ATM Withdrawal	Vancouver, WA	\$40
March 13, 2018	ATM Withdrawal	Vancouver, WA	\$200
May 9, 2018	ATM Withdrawal	Vancouver, WA	\$100
May 28, 2018	ATM Withdrawal	Vancouver, WA	\$100
June 12, 2018	ATM Withdrawal	Vancouver, WA	\$200
June 30, 2018	ATM Withdrawal	Vancouver, WA	\$200
Total			\$1,860

59. I have reviewed Chase security footage of the above ATM transactions that occurred on March 13, May 9, May 28, June 12, June 30 in the year 2018. This footage shows an individual, with the same physical characteristics and general appearance of ROSS, conducting the cash withdrawals from the SUBJECT ACCOUNT.

J. Recent Activity by ROSS

60. On May 23, 2018, at approximately 1:40 PM PST, the SSA Teleservice Center received a phone call from phone number (503) 895-5282, which was automatically recorded

1 by SSA systems. Phone number (503) 895-5282 is the same number listed on ROSS's
2 October 2016 US Passport renewal application.

3 61. I have reviewed the audio recording of this phone call, which lasts
4 approximately 13 minutes. During the call with the SSA employee, ROSS states his name is
5 T.M.T. and provides the correct corresponding identity verification information: DOB, POB,
6 and mother maiden name. The purpose of the phone call concerns what the estimated
7 monthly benefit amount for retirement benefits would be if he applied in the near future.

8 62. Phone records were obtained from the phone provider, MagicJack, related to
9 phone number (503) 895-5282, which shows this account was used to call SSA on May 23,
10 2018. The account is registered to "Ed Lewis" at the SUBJECT PREMISES address with an
11 initial activation date of November 16, 2009. Historical records show this phone number was
12 also previously registered to a "Tod Mitchell Thomas" at the SUBJECT MAILBOX address.
13 The current MagicJack device assigned to phone number (503) 895-5282 shows a serial
14 number of A921050801D1B0.

15 63. On July 3, 2018, ROSS applied for, and was issued, a California driver's
16 license in the identity of T.M.T. with the listed address as 4975 Valley West Blvd, Arcata,
17 CA. This address belongs to Red Roof Inn, a hotel chain.

18 64. Bank statements for the SUBJECT ACCOUNT were reviewed which shows
19 that at an unknown date between June 15, 2018 and July 16, 2018, the SUBJECT
20 ACCOUNT address was changed from the SUBJECT MAILBOX address to the Red Roof
21 Inn address at 4975 Valley West Blvd, Arcata, CA. However, at an unknown date between
22 July 17, 2018 and August 14, 2018, the address for the SUBJECT ACCOUNT was reverted
23 back to the SUBJECT MAILBOX address.

24 **K. ROSS's Connection to SUBJECT PREMISES and SUBJECT VEHICLE**

25 65. On April 24, 2009, ROSS purchased the SUBJECT PREMISES for \$215,000
26 in his true identity. According to Clark County, WA Assessor's Office records, ROSS is still
27 the present owner with all 2018 property taxes paid off.
28

1 66. The SUBJECT PREMISES address is the current address of record for ROSS
2 with the SSA, Medicare, and currently listed on bank accounts held in the ROSS identity at
3 Bank of America and KeyBank, which are actively used.

4 67. A search of WA DOL driver/vehicle database, covering the period of 2009 to
5 Present, show ROSS and E.T.L. are the only individuals ever associated with the SUBJECT
6 PREMISES address.

7 68. On September 25, 2018, I conducted surveillance outside the SUBJECT
8 PREMISES and observed ROSS driving a vehicle registered in his true identity, a gold 2006
9 Hyundai Sonata with Oregon license plate "445GLA". ROSS remotely opened the garage
10 door to the SUBJECT PREMISES and stored the vehicle inside. I maintained surveillance
11 for several hours outside the SUBJECT PREMISES until the late evening hours and ROSS
12 was not observed leaving the residence.

13 **COMMON CHARACTERISTICS FOR FRAUD SCHEME**

14 69. Based on my training and experience, these crimes are paper intensive and the
15 offenses generate a significant number of receipts and other records. Individuals who engage
16 in this type of identity fraud and financial fraud typically retain their fraudulently obtained
17 identity documents and amass large amounts of documents related to the crimes in their
18 personal possessions and/or premises, where it is perceived to be safe and readily accessible.

19 **REQUEST FOR SEALING**

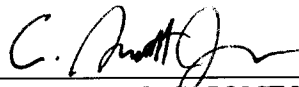
20 70. It is respectfully requested that this Court issue an order sealing, until further
21 order of the Court, all papers submitted in support of the requested search warrant, including
22 the application, this Affidavit, the attachments, and the requested search warrant. I believe
23 that sealing this document is necessary because the information to be seized is relevant to an
24 ongoing investigation, and any disclosure of the information at this time may cause flight
25 from prosecution, cause the destruction or tampering of evidence, or otherwise seriously
26 jeopardize the investigation. Premature disclosure of the contents of this application, this
27
28

1 Affidavit, the attachments, and the requested search warrant may adversely affect the
2 integrity of the investigation.

3 **CONCLUSION**

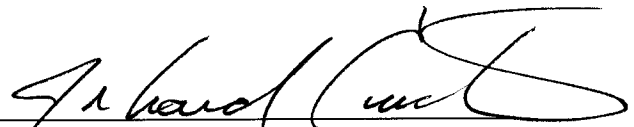
4 71. Based on the foregoing, I believe that there is probable cause that evidence,
5 fruits, and instrumentalities of the crimes of Theft of Public Funds in violation of 18 U.S.C. §
6 641; False Statement in Application and Use of Passport in violation of 18 U.S.C. § 1542;
7 Social Security Number Misuse in violation of 42 U.S.C. § 408(a)(7)(B); Access Device
8 Fraud in violation of 18 U.S.C. § 1029(a)(2) and; Aggravated Identity Theft in violation of
9 18 U.S.C. § 1028A(a)(1) are located at the SUBJECT PREMISES, which are more fully
10 described above and in Attachment A.

11 72. I therefore request that the Court issue warrants authorizing a search of the
12 SUBJECT PREMISES and SUBJECT VEHICLE for the items described in Attachment B,
13 and the seizure and examination of any such items found therein.

14
15 

16 CHRISTOPHER S. JONES, Complainant
17 Special Agent
18 Social Security Administration
19 Office of the Inspector General

20 Subscribed and sworn to before me this ^{1st} ~~2nd~~ day of October, 2018.

21
22 

23 HON. J. RICHARD CREATURA
24 UNITED STATES MAGISTRATE JUDGE
25
26
27
28

ATTACHMENT A-1

LOCATION TO BE SEARCHED – “SUBJECT PREMISES”

7818 NE 91st Ave, Vancouver, WA 98662 is a two-story, four-bedroom single family home located within Clark County, WA. The residence is located on the west side of NE 91st Ave inside a suburban neighborhood with multiple other single family homes located nearby. The residence is more particularly described as olive green in color with white and orange trim. There is a front entry door with a porch and steps leading up to the entrance from the driveway. The home has a two-car garage that faces NE 91st Ave, with the numbers “7818” prominently displayed vertically in dark-colored numbers on the left trim of the garage door.



ATTACHMENT A-2

LOCATION TO BE SEARCHED – “SUBJECT VEHICLE”

A gold 2006 Hyundai Sonata with Oregon license plate “445GLA” and Vehicle Identification Number 5NPEU46F66H129157.

ATTACHMENT B

ITEMS TO BE SEIZED

The following records, documents, files or materials, in whatever form that constitute evidence, instrumentalities, or fruits of violations of Theft of Public Funds in violation of 18 U.S.C. § 641; False Statement in Application and Use of Passport in violation of 18 U.S.C. § 1542; Social Security Number Misuse in violation of 42 U.S.C. § 408(a)(7)(B); Access Device Fraud in violation of 18 U.S.C. § 1029(a)(2) and; Aggravated Identity Theft in violation of 18 U.S.C. § 1028A(a)(1).

1. Identification documents in the name "Tod Mitchell Thomas" or "Edward Thomas Lewis" to include, but not limited to: driver's licenses, ID cards, Social Security cards, birth certificates, and US and/or foreign passports.
2. Correspondence and documents from federal/state agencies and private businesses addressed to "Tod Mitchell Thomas" or "Edward Thomas Lewis".
3. Any documents pertaining to employment and/or self-employment performed by "Steven Lynn Ross", "Tod Mitchell Thomas", or "Edward Thomas Lewis", to include, but not limited to: W-2s, 1099s, pay stubs, resumes, certificates/awards, offer/termination letters, business licenses, ledgers, and billing records.
4. Social Security Administration documents, records, and information related to: Steven Lynn Ross and his application/receipt of disability benefits and any estimated SSA benefit statements pertaining to "Tod Mitchell Thomas" or "Edward Thomas Lewis".
5. Evidence of any medical procedures that reflect significant medical care occurred (e.g. heart transplant) for Steven Lynn Ross and any associated medical/hospital or Medicare billing.
6. Credit cards, debit cards, checkbooks, and any other monetary instruments belonging to "Tod Mitchell Thomas" or "Edward Thomas Lewis".
7. Financial records such as bank account statements, investment account statements, receipts, wire transfers, deposits, checks, withdrawals, applications related to "Steven Lynn Ross", "Tod Mitchell Thomas", or "Edward Thomas Lewis".

8. Records of property ownership, such as vehicle or property deeds, in the names "Steven Lynn Ross", "Tod Mitchell Thomas", or "Edward Thomas Lewis".
9. Any information pertaining to MagicJack phone number (503) 895-5282 or device number A921050801D1B0.
10. Internal Revenue Service documents, tax records, tax filings, and tax information pertaining to "Steven Lynn Ross", "Tod Mitchell Thomas", and "Edward Thomas Lewis".
11. Any identification documents or other records belonging to other aliases or identities not known to law enforcement at this time, but that based under the totality of the circumstances, are believed to be used by the subject known as "Steven Lynn Ross".
12. Items of dominion and control of the residence located at 7818 NE 91st Ave, Vancouver, WA 98662.
13. Any records of store units, safe deposit boxes, or any other location where evidence may be secured.